



Administrator's Decision on Contributor Appeal

By Certified Mail

June 2, 2008

Jonathan S. Marashlian, Esq.
c/o The CommLaw Group
1483 Chain Bridge Road, Suite 301
McLean, VA 22101

Re: Compass Global, Inc. (Filer ID #826216)

Dear Mr. Marashlian:

The Universal Service Administrative Company (USAC) has completed its review of the letter of appeal you submitted on behalf of Compass Global, Inc., dated November 6, 2007 (the Appeal). The Appeal requests USAC's acceptance of revised 2005 and 2006 FCC Form 499-A Telecommunications Reporting Worksheets (Form 499-A) reporting annual revenue for 2004 and 2005.

Summary and Background

The Appeal states that Compass Global filed original 2005 and 2006 Forms 499-A on September 5, 2006.¹ Then on September 4, 2007, Compass Global filed what it believed were downward revisions to the 2005 and 2006 Forms 499-A.² On September 11, 2007, USAC rejected the September 4 submissions because they were not filed "within one year of the original submission[s]."³ A copy of the rejection letters addressing each of the 2005 and 2006 Forms 499-A are provided in Exhibit 1 hereto. Compass Global asserts in the Appeal that USAC should have accepted the downward revisions because they were in fact submitted within one year of the original submissions.

¹ Appeal, at 1 and 3.

² *Id.* at 2.

³ Letter from USAC to Compass Global, Inc. regarding 2005 Form 499-A Revision Rejection, p. 1 (September 11, 2007) and Letter from USAC to Compass Global, Inc. regarding 2006 Form 499-A Revision Rejection, p. 1 (September 11, 2007).

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2005 Form 499-A

On September 7, 2007, USAC received from Compass Global a 2005 Form 499-A marked as a "revision." Also included, as Attachment 1, was an unsigned copy of Compass Global's 2005 Form 499-A marked as "original." The Attachment 1 narrative indicated that the form had been submitted to USAC on September 4, 2006. USAC has no record of receiving the form marked as "original" prior to September 7, 2007.

USAC accepted and processed the September 7, 2007 submission as Compass Global's original filing because USAC did not have a record of previously receiving a 2005 Form 499-A from the company. USAC relied on the revenue reported on the 2005 Form 499-A to determine Compass Global's Universal Service Fund (USF) contribution obligation, which was reflected on the company's October, November and December 2007 invoices.⁴

2006 Form 499-A

On September 7, 2006, USAC received and processed an original 2006 Form 499-A. Nearly a year later, on September 5, 2007, USAC received a revised 2006 Form 499-A, which it rejected as untimely because it was not filed "within one year of the original submission."

The rejection letters referenced above, incorrectly stated "we are unable to accept the revision because it is not filed within one year of the original submission." In actuality, Commission rules state a downward revision may only be accepted by USAC within one year of the original due date for the form. On December 9, 2004, the Federal Communications Commission (FCC or Commission) issued the *Form 499-A Revision Order*,⁵ which, among other things, established a one year deadline beyond the *original filing deadline* for revisions to a Form 499-A that would result in a reduced USF contribution.⁶ The Order specifically sets March 31 of the "year after the original filing due date" as the deadline for any submitted revisions that would result in decreased USF

⁴ USAC encourages Compass Global to contact USAC's Customer Service Bureau at (888) 641-8722 with any questions concerning calculation of its universal service obligation. However, Compass Global should be aware that such discussions do not delay or toll and deadlines for filing further appeals for this matter as set forth in 47 C.F.R. §§ 54.719 - .720.

⁵ See *Federal-State Joint Board on Universal Service; 1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms; Changes to the Board of Directors of the National Exchange Carrier Association, Inc.*, CC Docket Nos. 96-45, 98-71, 97-21, Order, DA 04-3669, 20 FCC Rcd 1012 (2004) (*Form 499-A Revision Order*) (FCC established a downward revision deadline of one year from the original due date for FCC Forms 499-A, not from the date of the original submission as stated in USAC's rejection letter). See also, *Form 499-A Revision Order*, ¶ 10 ("We adopt a twelve-month deadline for filing revisions to the Form 499-A which would result in a decreased contribution amount.").

⁶ *Id.*

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contribution obligations.⁷ USAC apologizes to Compass Global for this error. Nonetheless, the incorrect language in USAC's letter does not alter the fact that Compass Global did not meet the filing deadlines for the 2005 and 2006 Forms 499-A, which are specified in Commission rules, stated in the form instructions and included on USAC's website.

Decision on Appeal: Denied as moot in part, and denied in part.

Analysis

2005 499-A

The 2005 Form 499-A rejection letter did not correctly state why the 2005 Form 499-A Compass Global designated as "original" was rejected because the letter did not distinguish between the two different 2005 Forms 499-A submitted by Compass Global on September 7, 2007. The rejection letter stated that USAC could not accept the revised 2005 Form 499-A. In fact, USAC rejected the 2005 Form 499-A marked as "original" because USAC has no record of ever receiving this filing. Instead, USAC accepted the 2005 Form 499-A Compass Global marked as "revised" and considered that as the original filing for 2005. Thus the "revised" 2005 Form 499-A was processed as the original 2005 Form 499-A and the 2005 Form 499-A marked as "original" was rejected. Therefore, USAC assessed Compass Global's USF contribution based on the "revised" 2005 Form 499-A, which USAC considered as the true original 2005 Form 499-A submission.

Because USAC's review indicates the relief requested by Compass Global in this instance has been provided (i.e., USAC determined Compass Global's USF contribution obligations for 2004, which totaled \$10,105.80 in support mechanism charges,⁸ based on the downwardly "revised" 2005 Form 499-A submitted on September 7, 2007), the request is moot. As such, there is no relief necessary and this portion of Compass Global's Appeal is denied as moot.

2006 499-A

USAC relied on revenue reported on the 2006 Form 499-A submitted on September 7, 2006 to determine Compass Global's 2005 USF contribution obligation and billed Compass Global adjustments totaling \$88,841.91 on its January, February and March 2007 invoices. In addition, the company received a late filing fee of \$1,451.96 for failure to timely submit its 2006 Form 499-A. The 2006 Form 499-A was due April 3, 2006 and

⁷ *Id.*

⁸ In addition to the universal service obligation of \$10,105.80 the company was billed a late filing fee of \$1,042.42 because the form, which had a due date of April 1, 2005, was received on September 7, 2007.

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had a one-year downward revision deadline of March 31, 2007.⁹ Because the revised 2006 Form 499-A was received on September 5, 2007, after the March 31, 2007 deadline for 2006 Form 499-A downward revisions, USAC properly rejected the form. Accordingly, this portion of Compass Global's Appeal is denied.

Recent FCC Action

On April 9, 2008, the FCC released a *Notice of Apparent Liability* (NAL) concerning, among other things, Compass Global's failure to timely pay billings based on its 2005 and 2006 reported revenue.¹⁰ This *Administrator's Decision on Contributor Appeal* denies Compass Global's request for revision to its 2005 revenue as the company did not timely file revised revenue. The timeliness of the filing of Compass Global's revised 2005 revenue is not addressed in the NAL and the decisions set forth in this letter do not have an impact on the findings identified in the NAL and do not address 2006 revenue.

If you wish to further appeal this decision, you may file an appeal with the FCC. Detailed instructions for filing appeals are available at:

<http://www.universalservice.org/fund-administration/contributors/file-appeal>

Sincerely,

USAC

Attachments

cc: Regina Dorsey, FCC Office of Managing Director
Hillary DeNigro, FCC Enforcement Bureau
Trent Harkrader, FCC Enforcement Bureau
Greg Guice, FCC Wireline Competition Bureau

⁹ *Form 499-A Revision Order*, ¶ 10.

¹⁰ See *Compass Global, Inc. Notice of Apparent Liability for Forfeiture*, File No. EB-06-1H-3060, FCC 08-97 (2008) (NAL).

EXHBIT 1



Universal Service Administrative Company

September 11, 2007

Attn: Jonathan Marashlian
Compass Global, Inc.
50 Tice Blvd., 3rd Floor
Woodcliff Lake, NJ 07677

Form 499 Filer ID: 826216

RE: 2005 FCC Form 499-A Revision Rejection

The Universal Service Administrative Company (USAC) has completed a review of the Revised FCC Form 499-A that you submitted for the purpose of revising revenue reported by 826216 Compass Global, Inc. for the period 2004. Based on the information provided, we are unable to accept the revision because it was not filed within one year of the original submission.

If you wish to appeal this decision with USAC, your appeal must be postmarked no later than 60 days after the date of USAC's rejection letter. Appeals postmarked after 60 days from the date of this letter will be automatically dismissed.

In the event that you choose to appeal the decision, you should follow these guidelines:

- Write a "Letter of Appeal to USAC" explaining why you disagree with this Form 499-Q rejection letter and identify the outcome that you request.
- Be sure to refer to CC Docket No. 96-45 on all communication with the FCC.
- The appeal must identify the "Legal Reporting Name" and "Filer 499 ID".
- Provide necessary contact information. Please list the name, address, telephone number, fax number, and e-mail address (if available) of the person who can most readily discuss this appeal with USAC.
- Explain the appeal to the USAC. Please provide documentation to support your appeal.
- Attach a photocopy of this Revised Form 499-Q Rejection decision that you are appealing.
- Mail your letter to:
Letter of Appeal
USAC
2000 L Street, NW, Suite 200
Washington, DC 20036
- Appeals submitted by fax, telephone call, and e-mail will not be processed.

The response will indicate whether USAC:

- Agrees with your letter of appeal, and approves an outcome that is different from the Revised Form 499-Q Rejection Letter; or
- Disagrees with your letter of appeal, and the reasons therefore.

If you disagree with USAC's response to your "letter of appeal," you may file an appeal with the FCC within 60 days of the date USAC issued its decision in response to your "Letter of Appeal." Again, please note your appeal must be postmarked no later than 60 days after the date of the Appeal Decision. Appeals postmarked after 60 days from the date of USAC's response to your appeal will be automatically dismissed. The FCC rules governing the appeals process (Part 54 of Title 47 of the Code of Federal Regulations 54.719 - 54.725) are available on the FCC web site (www.fcc.gov).

2000 L Street, N.W., Suite 200, Washington, DC 20036 Voice (888) 641-8722 Option 2, Option 1 Fax (202) 776-0980
Visit us online at: <http://www.universalservice.org>

Please be sure to refer to CC Docket No. 96-45 on all communication with the FCC. The appeal must also provide your company's name and Filer ID, plus necessary contact information, including the name, address, telephone number, fax number, and e-mail address of the person filing the appeal. Unless the appeal is by ECFS, please include a copy of the decision at issue.

Appeals submitted via the United States Postal Service, should be sent to the address below (For security purposes, hand-delivered or messenger-delivered documents will not be accepted at this Washington, DC address):

Federal Communications Commission
Office of the Secretary
445 - 12th Street, SW
Room TW-A325
Washington, DC 20554

Documents sent by hand-delivery or messenger should be sent to the following address:

Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743
(8:00 A.M. - 5:30 P.M. ET)

Appeals may also be submitted to the FCC electronically, either by the Electronic Comment Filing System (ECFS) or by fax. The FCC recommends filing with the ECFS to ensure timely filing. Instructions for using ECFS can be found on the ECFS page of the FCC web site. Appeals to the FCC filed by fax must be faxed to 202-418-0187. Electronic appeals will be considered filed on a business day if they are received at any time before 12:00 A.M. (midnight), Eastern Standard Time. Fax transmissions will be considered filed on a business day if the complete transmission is received at any time before 12:00 A.M.

If you have questions or concerns regarding this letter, please contact USAC Customer Service at (888) 641-8722 Option 1, Option 2.

Sincerely,

USAC



September 11, 2007

Attn: Jonathan Marashlian
Compass Global, Inc.
50 Tice Blvd., 3rd Floor
Woodcliff Lake, NJ 07677

Form 499 Filer ID: 826216

RE: 2006 FCC Form 499-A Revision Rejection

The Universal Service Administrative Company (USAC) has completed a review of the Revised FCC Form 499-A that you submitted for the purpose of revising revenue reported by 826216 Compass Global, Inc. for the period 2005. Based on the information provided, we are unable to accept the revision because it was not filed within one year of the original submission.

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- The appeal must identify the "Legal Reporting Name" and "Filer 499 ID".
- Provide necessary contact information. Please list the name, address, telephone number, fax number, and e-mail address (if available) of the person who can most readily discuss this appeal with USAC.
- Explain the appeal to the USAC. Please provide documentation to support your appeal.
- Attach a photocopy of this Revised Form 499-Q Rejection decision that you are appealing.
- Mail your letter to:
Letter of Appeal
USAC
2000 L Street, NW, Suite 200
Washington, DC 20036
- Appeals submitted by fax, telephone call, and e-mail will not be processed.

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- Agrees with your letter of appeal, and approves an outcome that is different from the Revised Form 499-Q Rejection Letter; or
- Disagrees with your letter of appeal, and the reasons therefore.

If you disagree with USAC's response to your "letter of appeal," you may file an appeal with the FCC within 60 days of the date USAC issued its decision in response to your "Letter of Appeal." Again, please note your appeal must be postmarked no later than 60 days after the date of the Appeal Decision. Appeals postmarked after 60 days from the date of USAC's response to your appeal will be automatically dismissed. The FCC rules governing the appeals process (Part 54 of Title 47 of the Code of Federal Regulations 54.719 – 54.723) are available on the FCC web site (www.fcc.gov).

Please be sure to refer to CC Docket No. 96-45 on all communication with the FCC. The appeal must also provide your company's name and Filer ID, plus necessary contact information, including the name, address, telephone number, fax number, and e-mail address of the person filing the appeal. Unless the appeal is by ECFS, please include a copy of the decision at issue.

Appeals submitted via the United States Postal Service, should be sent to the address below (For security purposes, hand-delivered or messenger-delivered documents will not be accepted at this Washington, DC address):

Federal Communications Commission
Office of the Secretary
445 - 12th Street, SW
Room TW-A325
Washington, DC 20554

Documents sent by hand-delivery or messenger should be sent to the following address:

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9300 East Hampton Drive
Capitol Heights, MD 20743
(8:00 A.M. - 5:30 P.M. ET)

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If you have questions or concerns regarding this letter, please contact USAC Customer Service at (888) 641-8722 Option 1, Option 2.

Sincerely,

USAC

EXHIBIT 14

**“499A – April 2005 Filing”, as printed from
USAC Website,
<http://www.usac.org/fund-administration/forms>**

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Approval by OMB
3060-0855

>>> Please read instructions before completing. <<<
Annual Filing -- due April 1.

Block 1: Contributor Identification Information

During the year, carriers must refile Blocks 1, 2 and 6 if there are any changes in Lines 104 or 112. See Instructions.

101 Filer 499 ID [If you don't know your number, contact the administrator at (888) 641-8722.]

826216

If you are a new filer, write "new" in this block and a Filer 499 ID will be assigned to you.

102 Legal name of reporting entity

Compass Global, Inc.

103 IRS employer identification number

22-3559398

104 Name telecommunications service provider is doing business as

Compass Global, Inc.

105 Telecommunications activities of filer [Select up to 5 boxes that best describe the reporting entity. Enter numbers starting with "1" to show the order of importance -- see directions.]

- | | | | |
|--|--|--|--|
| <input type="checkbox"/> All Distance | <input type="checkbox"/> CAP/CLEC | <input type="checkbox"/> Cellular/PCS/SMR (wireless telephony incl. by resale) | <input type="checkbox"/> Coaxial Cable |
| <input type="checkbox"/> Incumbent LEC | <input type="checkbox"/> Interexchange Carrier (IXC) | <input type="checkbox"/> Local Reseller | <input type="checkbox"/> Operator Service Provider (OSP) |
| <input type="checkbox"/> Payphone Service Provider | <input type="checkbox"/> Prepaid Card | <input type="checkbox"/> Private Service Provider | <input type="checkbox"/> Paging & Messaging |
| <input type="checkbox"/> Shared-Tenant Service Provider / Building LEC | <input type="checkbox"/> SMR (dispatch) | <input type="checkbox"/> Toll Reseller | <input type="checkbox"/> Satellite Service Provider |
| If Other Local, Other Mobile or Other Toll is selected, | | <input type="checkbox"/> Other Local | <input type="checkbox"/> Other Mobile |
| | | <input checked="" type="checkbox"/> 1 Other Toll | |

describe carrier type / services provided: --> Toll-free PIN Accessible Prepaid Platform Services

106.1 Holding company name (All affiliated companies must show the same name on this line.)

Compass Global, Inc.

106.2 Holding company IRS employer identification number

22-3559398

107 FCC Registration Number (FRN) [<https://svartifoss2.fcc.gov/cores/CoresHome.html>]
[For assistance, contact the CORES help desk at 877-480-3201 or CORES@fcc.gov]

0009-6902-56

108 Management company [if carrier is managed by another entity]

109 Complete mailing address of reporting entity
corporate headquarters

Street 1 50 Tice Blvd., 3rd Floor

City Woodcliff Lake

Street 2

St NJ Zip 07677

Street 3

Country

110 Complete business address for customer inquiries and complaints

[if different from address entered on Line 109] check if same as Line 109 ☒

Street 1 50 Tice Blvd., 3rd Floor

City Woodcliff Lake

Street 2

St NJ Zip 07677

Street 3

Country

111 Telephone number for customer complaints and inquiries [Toll-free number if available]

(201) - 802-0600 Ext

112 List all trade names used in the past 3 years in providing telecommunications.

Include all names by which you are known by customers.

a Forval International Tel

g

b

h

c

i

d

j

e

k

f

l

Use an additional sheet if necessary. Each reporting entity must provide all names used for carrier activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A
April 2005

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Page 2

Block 2-A: Regulatory Contact Information

201 Filer 499 ID [from Line 101]	826216				
202 Legal name of reporting entity [from Line 102]	Compass Global, Inc.				
203 Person who completed this Worksheet	First	Jonathan			Last Marashlian
204 Telephone number of this person	(703)	- 714-1313			Ext
205 Fax number of this person	(703)	- 714-1330			
206 E-mail of this person	jsm@commlawgroup.com				
207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent	Street 1	Compass Global, Inc.	City	Woodcliff Lake	First Dean
	Street 2	50 Tice Blvd., 3rd Floor	St	NJ	Zip 07677
	Street 3		E-Mail	none@none.com	Ph. 201 802-0600
					Ext
					fax
208 Billing address and billing contact person:	Street 1	Compass Global, Inc.	City	Woodcliff Lake	First Dean
[Plan administrators will send bills for contributions to the address. Please attach a written request for alternative billing arrangements.]	Street 2	50 Tice Blvd., 3rd Floor	St	NJ	Zip 07677
	Street 3		E-Mail	none@none.com	Ph. 201 802-0600
					Ext
					fax

Block 2-B: Agent for Service of Process

All carriers must complete Lines 209 through 213.

During the year, carriers must refile Blocks 1, 2 and 6 if there are any changes in this section. See Instructions.

209 D.C. Agent for Service of Process per 47 U.S.C. §413	First	Jerold	Last	Schnieder	Company
210 Telephone number of D.C. agent	(202)	- 393-6222			Ext
211 Fax number of D.C. agent	()	-			
212 E-mail of D.C. agent					
213 Complete business address of D.C. agent for hand service of documents	Street 1	801 Pennsylvania Ave., NW	City	Washington	
	Street 2	Suite 600	St		Zip 20004
	Street 3				
214 Local/alternate Agent for Service of Process (optional)	First	Jonathan	Last	Marashlian	Company Helin & Marashlian, LLC, The CommLaw Group
215 Telephone number of local/alternate agent	(703)	- 714-1300			Ext
216 Fax number of local/alternate agent	(703)	- 714-1330			
217 E-mail of local/alternate agent	jsm@commlawgroup.com				
218 Complete business address of local/alternate agent for hand service of documents	Street 1	1483 Chain Bridge Road	City	McLean	
	Street 2	Suite 301	St	VA	Zip 22101
	Street 3				

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Page 3

Block 2-C: FCC Registration and Contact Information

Carriers must refile Blocks 1, 2 and 6
if there are any changes in this section. See Instructions.

219 Filer 499 ID [from Line 101]

826216

220 Legal name of reporting entity [from Line 102]

Compass Global, Inc.

221 Chief Executive Officer (or, highest ranking company officer
if the filing entity does not have a chief executive officer)

First

Dean

Last

Cary

222 Business address of individual named on Line 221

check if same as Line 109 ☒

Street 1 50 Tice Blvd., 3rd Floor

Street 3

Street 2

City Woodcliff Lake

St NJ

Zip 07677

223 Second ranking company officer, such as Chairman
(Must be someone other than the individual listed on Line 221)

First

Last

224 Business address of individual named on Line 223

check if same as Line 109 ☐

Street 1

Street 3

Street 2

City

St

Zip

225 Third ranking company officer, such as President or Secretary
(Must be someone other than individuals listed on
Lines 221 or 223)

First

Last

226 Business address of individual named on Line 225

check if same as Line 109 ☐

Street 1

Street 3

Street 2

City

St

Zip

227 Indicate jurisdictions in which the filing entity provides telecommunications service. Include jurisdictions in which telecommunications service was provided in the past 15 months
and jurisdictions in which telecommunications service is likely to be provided in the next 12 months.

☐ Alabama

☐ Guam

☐ Massachusetts

☒ New York

☐ Tennessee

☐ Alaska

☐ Hawaii

☐ Michigan

☐ North Carolina

☐ Texas

☐ American Samoa

☐ Idaho

☐ Midway Atoll

☐ North Dakota

☐ Utah

☐ Arizona

☐ Illinois

☐ Minnesota

☐ Northern Mariana Islands

☐ U.S. Virgin Islands

☐ Arkansas

☐ Indiana

☐ Mississippi

☐ Ohio

☐ Vermont

☐ California

☐ Iowa

☐ Missouri

☐ Oklahoma

☐ Virginia

☐ Colorado

☐ Johnston Atoll

☐ Montana

☐ Oregon

☐ Wake Island

☐ Connecticut

☐ Kansas

☐ Nebraska

☐ Pennsylvania

☐ Washington

☐ Delaware

☐ Kentucky

☐ Nevada

☐ Puerto Rico

☐ West Virginia

☐ District of Columbia

☐ Louisiana

☐ New Hampshire

☐ Rhode Island

☐ Wisconsin

☐ Florida

☐ Maine

☒ New Jersey

☐ South Carolina

☐ Wyoming

☐ Georgia

☐ Maryland

☐ New Mexico

☐ South Dakota

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A

April 2005

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Page 4

Block 3: Carrier's Carrier Revenue Information

301	Filer 499 ID [from Line 101]	826216				
302	Legal name of reporting entity [from Line 102]	Compass Global, Inc.				
Report billed revenues for January 1 through December 31, 2004. Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.						
		Total Revenues	If breakouts are not book amounts, enter whole percentage estimates		Breakouts	
		(a)	Interstate (b)	International (c)	Interstate Revenues (d)	International Revenues (e)
See instructions regarding percent interstate & international.						
Revenues from Services Provided for Resale by Other Contributors to Federal Universal Service Support Mechanisms						
<i>Fixed local service</i>						
Monthly service, local calling, connection charges, vertical features, and other local exchange service including subscriber line and PICC charges to IXC's						
303.1	Provided as unbundled network elements (UNEs)	\$0.00	0.00	0.00	\$0.00	\$0.00
303.2	Provided under other arrangements	\$0.00	0.00	0.00	\$0.00	\$0.00
Per-minute charges for originating or terminating calls						
304.1	Provided under state or federal access tariff	\$0.00	0.00	0.00	\$0.00	\$0.00
304.2	Provided as unbundled network elements or other contract arrangement	\$0.00	0.00	0.00	\$0.00	\$0.00
305	Local private line & special access service	\$0.00	0.00	0.00	\$0.00	\$0.00
306	Payphone compensation from toll carriers	\$0.00	0.00	0.00	\$0.00	\$0.00
307	Other local telecommunications service revenues	\$0.00	0.00	0.00	\$0.00	\$0.00
308	Universal service support revenues received from Federal or state sources	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>Mobile services (including wireless telephony, paging & messaging, and other mobile services)</i>						
309	Monthly, activation, and message charges except toll	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>Toll services</i>						
310	Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.)	\$0.00	0.00	0.00	\$0.00	\$0.00
311	Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PICC pass-through, and other switched services not reported above)	\$0.00	0.00	0.00	\$0.00	\$0.00
312	Long distance private line services	\$0.00	0.00	0.00	\$0.00	\$0.00
313	Satellite services	\$0.00	0.00	0.00	\$0.00	\$0.00
314	All other long distance services	\$0.00	0.00	0.00	\$0.00	\$0.00

Note: As stated in the instructions, for all revenues reported on this page, you must retain the Filer 499 ID and contact information for the associated customers. You must verify that each of these customers is a direct contributor to the federal universal service support mechanism and that the customer is purchasing service for resale as telecommunications. These records must be made available to the administrator or the FCC upon request. (See instructions.)

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Page 5

Block 4-A: End-User and Non-Telecommunications Revenue Information

401 Filer 499 ID [from Line 101]

826216

402 Legal name of reporting entity [from Line 102]

Compass Global, Inc.

Report billed revenues for January 1 through December 31, 2004.

Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars. See instructions regarding percent interstate & international.

Revenues from All Other Sources (end-user telecom. & non-telecom.)

403 Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions

Total
RevenuesIf breakouts are not book
amounts, enter whole
percentage estimates

Breakouts

Interstate
RevenuesInternational
Revenues

(a)

Interstate
(b)International
(c)

(d)

(e)

\$0.00

0.00

0.00

\$0.00

\$0.00

Fixed local services

Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges and PCCC charges

\$0.00

0.00

0.00

\$0.00

\$0.00

404.1 Provided at a flat rate including interstate toll service

404.2 Provided without interstate toll included (see instructions)

\$0.00

0.00

0.00

\$0.00

\$0.00

405 Tariffed subscriber line charges and PCCC charges levied by a local exchange carrier on a no-PIC customer

\$0.00

0.00

0.00

\$0.00

\$0.00

406 Local private line and special access service

\$0.00

0.00

0.00

\$0.00

\$0.00

407 Payphone coin revenues (local and long distance)

\$0.00

0.00

0.00

\$0.00

\$0.00

408 Other local telecommunications service revenues

\$0.00

0.00

0.00

\$0.00

\$0.00

Mobile services (including wireless telephony, paging & messaging, and other mobile services)

409 Monthly and activation charges

\$0.00

0.00

0.00

\$0.00

\$0.00

410 Message charges including roaming, but excluding toll charges

\$0.00

0.00

0.00

\$0.00

\$0.00

Toll services

411 Prepaid calling card (including card sales to customers and non-carrier distributors) reported at face value of cards

\$0.00

0.00

0.00

\$0.00

\$0.00

412 International calls that both originate and terminate in foreign points

\$0.00

0%

100%

\$0.00

413 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenues reported on Line 412

\$0.00

0.00

0.00

\$0.00

\$0.00

414 Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PCCC pass-through, and other switched services not reported above)

\$5,534,644.00

3.36

95.79

\$185,858.00

\$5,301,908.00

415 Long distance private line services

\$0.00

0.00

0.00

\$0.00

\$0.00

416 Satellite services

\$0.00

0.00

0.00

\$0.00

\$0.00

417 All other long distance services

\$0.00

0.00

0.00

\$0.00

\$0.00

418 Revenues other than U.S. telecommunications revenues.

Information services, inside wiring maintenance, billing and collection customer premises equipment, published directory, dark fiber, Internet access, cable TV program transmission, foreign carrier operations, and non-telecommunications revenues (See instructions.)

\$13,814,900.00

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Page 6

Block 4-B: Total Revenue and Uncollectible Revenue Information

Block 4-B: Total Revenue and Uncollectible Revenue Information

		Total Revenues (a)		Breakouts	
				Interstate Revenues (d)	International Revenues (e)
419	Gross billed revenues from all sources (incl. reseller & non-telecom.) [Lines 303 through 314 plus Lines 403 through 418]	\$19,349,544.00		\$185,858.00	\$5,301,908.00
420	Gross universal service contribution base amounts [Lines 403 through 411 Lines 413 through 417] See Figure 4 in instructions.	\$5,534,644.00		\$185,858.00	\$5,301,908.00
421	Uncollectible revenue/bad debt expense associated with gross billed revenues amounts shown on Line 419	\$0.00		\$0.00	\$0.00
422	Uncollectible revenue/bad debt expense associated with universal service contribution base amounts shown on Line 420	\$0.00		\$0.00	\$0.00
423	Net universal service contribution base revenues [Line 420 minus line 422]	\$5,534,644.00		\$185,858.00	\$5,301,908.00

Block 5: Additional Revenue Breakouts

501	Filer 499 ID [from Line 101]	526216
502	Legal name of reporting entity [from Line 102]	Compass Global, Inc.

Most filers must contribute to LNP administration and must provide the percentages requested in Lines 503 through 510. Filing entities that use Line 603 to certify that they are exempt from this requirement need not provide this information.

Percentage of revenues reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

		Block 3 Carrier's Carrier (a)	Block 4 End-User Telecom. (b)
503	Southeast: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, and U.S. Virgin Islands	0 %	0 %
504	Western: Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming	0 %	0 %
505	West Coast: California, Hawaii, Nevada, American Samoa, Guam, Johnston Atoll, Midway Atoll, Northern Mariana Islands, and Wake Island.	0 %	0 %
506	Mid-Atlantic: Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, and West Virginia	0 %	0 %
507	Mid-West: Illinois, Indiana, Michigan, Ohio, and Wisconsin	0 %	0 %
508	Northeast: Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont	100 %	100 %
509	Southwest: Arkansas, Kansas, Missouri, Oklahoma, and Texas	0 %	0 %
510	Total [Percentages must add to 0 or 100.]	100 %	100 %

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4-B, Line 420 but may be excluded from a filer's TRS, NANPA, LNP, and FCC interstate telephone service provider regulatory fee contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below. As stated in the instructions, you must have in your records the FCC Filer 499 ID for each customer whose revenues are included on Line 511. (See instructions.)

	(a) Total Revenues	(b) Interstate and International
Revenues from resellers that do not contribute to Universal Service	\$ 0	\$ 0

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Page 7

Block 6: CERTIFICATION: to be signed by an officer of the filer

601 Filer 499 ID [from Line 101] 826216
 602 Legal name of reporting entity [from Line 102] Compass Global, Inc.

Section IV of the instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service Administrator will determine which entities meet the *de minimis* threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to: Universal Service ☐ TRS ☐ NANPA ☐ LNP Administration ☐

Provide explanation below:

604 Please indicate whether the reporting entity is State or Local Government Entity ☐ I.R.C. § 501 Tax Exempt ☐ PUHCA § 34 (a)(1) Exempt ☐

605 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules. ☒

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and, to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year. In addition, I swear, under penalty of perjury, that all requested identification registration information has been provided and is accurate. If the above-named reporting entity is filing on a consolidated basis, I certify that this filing incorporates all of the revenues for the consolidated entities for the entire year and that the filer adhered to and continues to meet the conditions set forth in Section II-B of the instructions.

606 Signature

607 Printed name of officer First Dean Last Cary
 608 Position with reporting entity CEO
 609 Business telephone number of officer (201) 802-0600 Ext 101
 610 E-mail of officer deancary@compassglobal.net
 611 Date 09/04/2007
 612 Check those that apply: ☒ Original April 1 filing for year ☐ New filer, registration only ☐ Revised filing with updated registration ☐ Revised filing with updated revenue data

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036
 For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet information: (888) 641-8722 or via e-mail: Form499@universalservice.org

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

USAC

ALTERNATIVE BILLING ARRANGEMENTS FORM

Line 208 of Form 499-A asks for one billing address and contact person to be used by all four administrators. If your company requires invoices to be sent to different contacts/addresses for the four funds, please use this form. Universal Service Fund invoices will be mailed to the address input on Line 208 of the 499-A itself.

Filer 499 ID: 026216

Legal Name of Carrier: Compass Global, Inc.

TRS- Telecommunications Relay Services Fund Billing Address

Billing Contact First Name: Last Name:

Billing Contact Telephone: Extension:

Billing Contact Fax Number: Billing Contact E-Mail:

Billing Contact Address:

City: State: Zip Code:

NANP- North American Numbering Plan Fund

Billing Contact First Name: Last Name:

Billing Contact Telephone: Extension:

Billing Contact Fax Number: Billing Contact E-Mail:

Billing Contact Address:

City: State: Zip Code:

LNP- Local Number Portability Fund

Billing Contact First Name: Last Name:

Billing Contact Telephone: Extension:

Billing Contact Fax Number: Billing Contact E-Mail:

Billing Contact Address:

City: State: Zip Code:

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Request for Review of Decision of the
Universal Service Administrator by
Compass Global, Inc.

)
)
) CC Docket No. 96-45
) WC Docket No. 06-122
)

AFFIDAVIT OF DEAN CARY
PRESIDENT OF COMPASS GLOBAL, INC.

Dean Cary, being first duly sworn according to law, does hereby depose and say as follows:

1. I am President of Compass Global, Inc. I have served in that capacity for more than ten years. I have personal knowledge of the events described therein.

2. In June, 2006, Compass Global received a letter from the Investigations & Hearings Division ("IHD") of the FCC's Enforcement Bureau advising the Company that if it was planning to provide or was providing telecommunications services to end-users for a fee, it must registered with the Universal Service Fund Administrator. Compass Global did not provide any of the telecommunications services referenced in the letters nor did it provide any services, at all, to "end-users".

3. Compass Global contacted IHD, and over the ensuing months was fully responsive to IHD Staff requests for information. Nothing in this discussion process, however, convinced Compass Global that the nature of its service offering brought it within the universe of carriers which should have registered with USAC and reported revenues via FCC Form 499.

4. IHD Staff indicated that unless the Company filed FCC Forms 499-A and commenced contribution to the funding of federal support mechanisms, a formal investigation would be initiated against it. Therefore, the Company obtained a waiver of the original filing dates for the forms from Mr. Nand Gupta, the FCC's IHD contact person identified as the appropriate

individual to address the Compass Global matter; the waiver effectively extended Compass Global's filing dates for the two forms up to and including September 5, 2006. Compass Global filed original 2005 Form 499-A and original 2006 Form 499-A by that filing deadline.

5. Compass Global began receiving invoices from the various other Fund Administrators the following month, October, 2006, and received its first USAC invoice in January, 2007. Compass Global's January USAC invoice billed the Company contemporaneously and prospectively, based upon its 2006 499-Q data; it also billed amounts retroactively, totaling \$29,613.97 on the January, 2007 bill alone.

6. On January 26, 2007, at the request of USAC personnel, I forwarded to USAC additional hard copies of the original 2005 and 2006 Forms 499-A which had been filed the previous September. At the time of USAC's request for additional hard copies of these documents, Compass Global was not advised that the 2005 Form 499-A purportedly had not been received by USAC.

7. In June, 2007, notwithstanding that Compass Global had complied with IHD's demand that it file Forms 499-A, IHD nonetheless instituted a formal investigation against Compass Global. As a result, the Company retained telecommunications legal counsel and only at that point in time became aware that the revenue data submitted in the Company's original 2005 and 2006 Forms 499-A had been inaccurately reported. At this time, the Company learned it had overpaid, and was presently overpaying, federal support assessments not only to USAC but to each of the federal support funds. It was necessary, therefore, to submit revised Forms 499-A to USAC.

8. Compass Global submitted these revised forms to USAC on September 4, 2007. Compass Global's revised 2005 Form 499-A and revised 2006 Form 499-A were forwarded to USAC by overnight courier on that date and USAC returned "file-stamp" copies evidencing receipt of both the revised 2005 filing and the revised 2006 filing the following day, September 5, 2007.

9. On September 11, 2007, USAC issued a letter to Compass Global in which it unequivocally rejected the revised 2005 Form 499-A.

10. On the same date, by separate letter, USAC advised Compass Global that it was also unequivocally rejecting the Company's revised 2006 Form 499-A.

11. On November 7, 2007, Compass Global appealed both USAC's rejection of the Company's revised 2005 Form 499-A and its rejection of the Company's revised 2006 Form 499-A. In that combined appeal of both rejection decisions, Compass Global specifically noted for USAC the Company's calculation that if USAC persisted in relying upon data reported in the Company's original 2005 Form 499-A -- rather than accepting and processing the revised version of the form -- the Company's liability for federal USF assessments based upon its CY 2004 revenues would exceed amounts rightfully owed by more than \$36,000.

12. Also on November 7, 2007, Compass Global transmitted copies of its USAC Letter of Appeal to the Chief of the FCC's Revenue and Receivables Operations Group and Neustar, Inc., the NECA TRS Collections Department and the Chief Billing and Collection Agent for Welch & Company LLP along with a request that the entities cease all collection efforts during the pendency of the USAC appeal.

13. In January, 2008, while Compass Global's appeal was still pending, the FCC informed the Company that NECA had referred a debt to the FCC for collection.

14. On February 8, 2008, Compass Global appealed this notice of debt transfer, explaining, as it did so that, among other things, the amount identified for collection was inaccurate not only because it failed to take into consideration a \$104,534.37 credit adjustment resulting from USAC's processing of a Revised 2007 FCC Form 499-A, but also because that amount also failed to

take into consideration the 'Appealed' status of USAC denials of Revised 2006 and 2005 Form 499-As.

15. On February 28, 2008, the FCC sent Compass Global a second notice of intent to transfer debt for collection.

16. On March 28, 2008, Compass Global contested this subsequent notice of debt transfer in its second TRS Appeal. The TRS amounts invoiced to Compass Global had been rendered inaccurate at least to some degree by USAC's reporting to NECA of an inaccurate contribution base revenues; thus, USAC's refusal to correct the Company's revenue data effectively precluded an accurate quantification of the amount due NECA, *if any*, by Compass Global. Because the various appeals were thus inextricably intertwined, Compass Global served this second TRS appeal not only upon the FCC and NECA but upon USAC as well.

17. On April 9, 2008, the FCC released a Notice of Apparent Liability ("NAL") for Forfeiture in File No. EB-06-IH-3060. At the time of the issuance of the NAL, USAC had not addressed Compass Global's appeal.

18. On June 6, 2008, Compass Global filed a response to the NAL, in which the Company addressed the far-reaching implications flowing from USAC's refusal to process the Company's revised Form 499-As for 2005 and 2006, and USAC's protracted delay in providing any response to Compass Global.

19. On June 2, 2008, the Administrator's Decision on Contributor's Appeal was issued by the USAC Administrator. Upon receipt of the Administrator's Decision, Compass Global learned for the first time that USAC was attempting to disavow receipt of the Company's original 2005 Form 499-A. The Administrator's Decision also misstated the date upon which the Company's revised 2005 and 2005 Form 499-As were submitted, placing that filing date at

September 7, 2007, despite issuance by USAC of “file-stamps” indicating receipt on September 5, 2007. The Administrator’s Decision also informed Compass Global that, contrary to USAC’s unequivocal rejection of both the original 2005 and 2006 Forms 499-A on September 11, 2007, USAC had actually, without knowledge to Compass Global, unilaterally converted the Company’s revised 2005 Form 499-A filing into a *de facto* original filing, thereafter processing the form and billing Compass Global USF assessments based upon revenue figures provided therein.

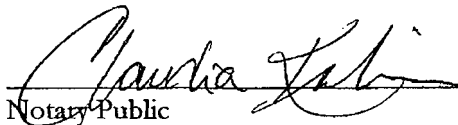
20. Compass Global has reviewed the document USAC admits it posted to its website, “499A – April 2005 Filing”. This document has been altered from its submitted form without the knowledge or consent of Compass Global. Specifically, line 612 of the Form has been altered to reflect the nature of the filing as “Original April 1 filing for the year”. In the document as actually filed by Compass Global, line 612 clearly noted that the filing was a “Revised filing with updated revenue data.”

I affirm under penalty of perjury that the foregoing is true and correct.



Dean Cary

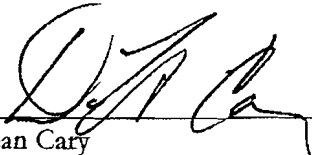
Subscribed and sworn to before me this 30 day of July 2008.


Notary Public

VERIFICATION

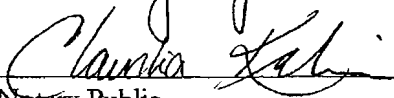
State of New Jersey)
)
County of Bergen) ss.

I, Dean Cary, being duly sworn according to law, depose and say that I am President of Compass Global, Inc. ("Compass"); that I am authorized to and do make this Verification for it; that the facts set forth in the appeal are true and correct to the best of my knowledge, information and belief. I further depose and say that the authority to submit the notice has been properly granted.

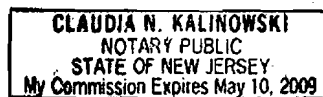


Dean Cary

Subscribed and sworn before me this 30 day of July, 2008.



Notary Public



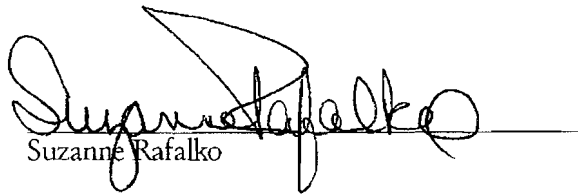
CERTIFICATE OF SERVICE

I, Suzanne Rafalko, hereby certify that true and correct copies of the foregoing Response of Compass Global, Inc., to Notice of Apparent Liability for Forfeiture, were hand-delivered this 31st day of July, 2008, to the following:

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o NATEK
236 Massachusetts Avenue, N.E.
Suite 110
Washington, D.C. 20002
(via Hand Delivery)

Universal Service Administrator
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036
(via Hand Delivery)

Hillary S. DeNigro, Chief
Trent B. Harkrader, Deputy Chief
Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 4-C330
Washington, D.C. 20005
(via Hand Delivery)


Suzanne Rafalko